

EXHIBIT H

[Excerpts of a December 20, 2017 letter from Eric
Vandevelde to Nicholas T. Herrera]

GIBSON DUNN

Nicholas T. Herrera
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5. Oracle's Fifth Set of Interrogatories

Rimini agrees to provide amended responses to Oracle's Fifth Set of Interrogatories by January 30, 2018.

6. Rimini's Privilege Entries

Rimini completed its investigation of the list of hundreds of documents that Oracle claimed in its October 23, 2017 letter were "erroneously redacted" and produced those materials for which it determined that privilege designations should be withdrawn. *See* Dec. 14, 2017 letter from S. Schutter to L. Lee; Nov. 22, 2017 letter from S. Schutter to L. Lee.

7. Rimini's Responses to Oracle's Seventh Set of Interrogatories

Rimini does not believe its first amended response to Interrogatory No. 23 or its response to Interrogatory No. 24 are deficient, so Rimini does not intend to update them at this time. With regard to Interrogatory No. 23, Rimini does not have or is not aware of any policies, practices,¹ or procedures regarding the deletion of fixes, patches, or updates. Rimini has addressed the use of client ftps in the distribution of updates in its operative response to Interrogatory No. 23. *See* Rimini's First Amended Response to Interrogatory No. 23 at note 8. With regard to Interrogatory No. 24, Rimini provided the information it is able to provide regarding its collection efforts of instant messages for the custodians identified in its response. Further, based on Rimini's investigation, custodians Satish Narasimhan, Kevin Maddock, David Potts, Seth Ravin, David Rowe, and Brian Slepko never used Yahoo Instant Messenger during the relevant time period, and Rimini is unaware of any other collection issues related to these custodians—so they are not responsive to Interrogatory No. 24.

8. Rimini's Response to Oracle's Interrogatory No. 2

Rimini agreed to consider Oracle's request that Rimini supplement its response to Oracle's Interrogatory No. 2 to include "the period of time that Rimini claims to have ceased using the Code Analyzer program, or the date on which the use of the program resumed," and also to "include the use of the Dev Review program." *See* Nov. 30, 2017 letter from E. Vandevelde to N. Herrera. Rimini now agrees to supplement its response to this interrogatory by January 30, 2018.

¹ Rimini incorporates herein its objections to Interrogatory No. 23, including, in particular, to the undefined term "practices." Rimini interprets practices to mean any formal practices sanctioned or approved by Rimini.